

Before the Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

Calling Party Pays Service Option
in the Commercial Mobile Radio Services

WT Docket No. 97-207

Reply Comments of AirTouch Communications, Inc.
on Notice of Inquiry

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SUMMARY

Calling Party Pays ("CPP") is properly viewed as a billing option offered by CMRS carriers to their subscribers. CPP is not a communications service in and of itself. Rather, CPP has two aspects: a billing arrangement used in conjunction with CMRS services offered on a "casual calling" basis. CPP is also not necessarily a unique interconnection arrangement. There is no need to revisit the LEC-CMRS interconnection debate in order to implement CPP, as a few commenters suggest. Implementing CPP through revised interconnection arrangements could stifle CMRS carriers' ability to price flexibly in response to growing market competition, and thereby subvert the Commission's goals for the wireless industry.

Although the Commission has extensive authority to regulate LEC-CMRS interconnection arrangements under Section 332, the better course of action for CPP is for the Commission to use its Title I authority to require LECs to offer their existing billing and collection services in such a way as to enable CMRS carriers to implement CPP. This Title I authority was specifically reserved when the Commission detariffed billing and collection services twelve years ago; and this authority can be exercised to serve statutory purposes. A number of statutory purposes would be served here, including promoting more options for consumers and encouraging competition. Other regulatory actions are not needed: technical issues and other issues concerning "leakage" that might stifle CPP development are being addressed by the industry.

Consumer demand for CPP is significant, and consumer benefits from CPP are real. Many commenters argue that CPP will deter fixed to mobile calls because wireline customers are not accustomed to paying for outbound calls. But consumers, not wireline LECs, should be the sole arbiters of what service arrangements they find preferable. By eliminating barriers to CPP such as the lack of LEC billing and collection services, the market can determine whether CPP deters inbound calls or not. Moreover, consumers are generally familiar with the concept that the party electing to purchase services pays the costs. Consequently, it is not fair to assume that wireline consumers will be deterred from using the advantages of mobile networks.

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Reply Comments of AirTouch Communications, Inc.

AirTouch Communications, Inc. ("AirTouch")¹, hereby submits its reply to the comments submitted on December 16, 1997, in response to the Notice of Inquiry concerning a "Calling Party Pays" ("CPP") service option offered by Commercial Mobile Radio Service ("CMRS") providers.²

I. CPP Is Not A Separate Communications Service Nor Does It Need To Be a Unique Interconnection Arrangement

The record reflects some fundamental misconceptions about the best legal and regulatory status for a CPP service option. A number of parties argue that CPP is a communications service, and/or that it should be implemented as an interconnection arrangement.³ In its reply, AirTouch explains in more detail why CPP is properly viewed as simply a billing option that can be offered by CMRS carriers to their subscribers, in conjunction with ordinary CMRS services offered on a "casual calling" basis. CPP should not be implemented as a new interconnection arrangement, nor is exercise of the

¹ AirTouch is a CMRS provider with interests in cellular, paging, PCS and mobile satellite services, both domestic and international.

²"In the Matter of Calling Party Pays Service Option in the Commercial Mobile Radio Services," WT Docket No. 97-207, Notice of Inquiry, FCC 97-341 (October 23, 1997)("Notice").

³See, e.g., Comments of GTE at 5; Comments of AT&T Wireless at 6; Comments of PCIA at 3; Comments of Sprint Spectrum d/b/a Sprint PCS at 9; Comments of Source One at 7-8.

Commission's authority over LEC-CMRS interconnection needed. Implementing CPP through interconnection arrangements could stifle competitive market forces and thereby subvert the Commission's goals for the wireless industry.

CPP is not itself a separate communications service, but simply an optional billing arrangement offered in conjunction with a communications service: traditional CMRS communications service. Some of this confusion may result from how CPP is defined. For example, PCIA defines CPP as "the placing of a call by a landline customer, its delivery to a mobile customer, and the exchange of the appropriate billing data between the LEC and the CMRS provider."⁴ This broad definition of CPP incorporates a communications service between mobile stations and land stations that is interconnected with the PSTN, provided for profit and available to the public. Therefore, PCIA concludes that CPP is a "communications service."⁵

But this creates an entirely new "service" unnecessarily - the only characteristic distinguishing it from traditional CMRS services is the nature of the billing arrangements. These billing arrangements are not a new communications service, merely an adjunct to the underlying CMRS services. As GTE notes, the fact that the calling party is being billed does not affect the nature of the underlying service.⁶ In this case, the underlying service is still CMRS, and CPP changes only the billing arrangements involved.⁷ For the same

⁴ Comments of PCIA at 4.

⁵See, e.g., Comments of PCIA at 4; Comments of GTE at 6; (GTE argues that CPP is CMRS because the principal service is "completing a call from either a mobile or land station to a CMRS subscriber using a CMRS network").

⁶Comments of GTE at 6.

⁷Thus, the underlying CMRS service should still be regulated as CMRS. For example, Section 332's preemption of state rate regulation of CMRS applies to the rates charged by CMRS carriers to customers placing inbound calls in a CPP environment. End-users placing calls to CMRS subscribers with CPP are using CMRS services. These rates must, as Congress intended for all CMRS rates, be set by the competitive market. See 47 U.S.C. § 332(c)(3).

reasons that GTE concludes that CPP is not a local exchange service, CPP should not be viewed as a new CMRS service.⁸

In AirTouch's view, CPP has two separate aspects: a billing arrangement that offers CMRS subscribers the ability to obtain the same services with the added feature of having incoming calls billed to the calling party; and ordinary CMRS services offered on a "casual calling" basis to the calling party who is billed for the airtime.⁹ Other parties, such as US WEST and BellSouth, support this view. While AirTouch disagrees with BellSouth's analysis of the consumer benefits of CPP, we agree that CPP is similar to "first incoming minute free" promotions also offered by CMRS carriers.¹⁰

Since a CMRS carriers' offering of a CPP billing option does nothing to change the underlying communications service, CPP does not implicate the "physical connection" of LEC and CMRS networks. As a legal matter, interconnection concerns the "physical connections" between networks.¹¹ CPP involves no change in the "physical connections" between networks. Accordingly, the substantial body of law governing interconnection arrangements between network providers need not be involved in CPP.¹² Since there is no change in the physical connections between networks, there is no need to change the interconnection arrangements.

⁸ For example, GTE notes that the fact that calls to CPP subscribers may be billed by the LEC does not change the nature of the service. Comments of GTE at 6.

⁹ See, e.g., Comments of Paging Network, Inc. ("PageNet"). at 4.

¹⁰ See Comments of BellSouth at 4; see also Comments of US WEST at 1 ("CPP is a billing option – nothing more"); Comments of Sprint Corporation at 1 (CPP is merely a billing and collection arrangement between CMRS providers and LECs).

¹¹ See, e.g., 47 U.S.C. § 332(c)(1)(B); 47 C.F.R. § 51.305.

¹² See 47 U.S.C. §§ 251(b)(5), 251(c)(2); "Implementation of the Local Competition Provisions of the Telecommunications Act of 1996," First Report and Order, CC Docket 96-98, 11 FCC Rcd 15499 (1996) ("Local Competition Order") ; aff'd in part and vacated in part sub nom. Iowa Utilities Board v. FCC, 120 F.3d 753, 1997 WL 403401 (8th Cir. 1997) ("Iowa Utilities Board"); 47 U.S.C. § 332(c)(1)(B). AirTouch agrees that Section 332 gives the Commission extensive authority over LEC-CMRS interconnection arrangements. See, e.g., Iowa Utilities Board, 120 F.3d 753, 800, n.21.

A number of parties nonetheless believe that promoting CPP requires the Commission to establish a "CPP service" whereby the costs of originating, switching, and transport of calls between LEC and CMRS networks are divided and charges assessed on the end user originating the call, in a manner similar to the arrangements between LECs or between LECs and IXC's.¹³ Other parties believe the Commission should use its authority to require LECs to offer certain services, or to adopt a "national policy" for CPP.¹⁴

For example, Centennial Cellular describes an arrangement whereby either the parties through negotiation, or a regulator, establishes the charges assessed on end users, and the division of such charges between co-carriers - a model adopted from the wireline industry.¹⁵ Similarly, Beples, Inc., proposes that compensation to wireless carriers (or any other type of carrier) for termination of calls originating on other networks be provided through an interconnection arrangement similar to the current arrangement for calls between wireline carriers, i.e., access charges.¹⁶ Sprint PCS also argues that the Commission should implement CPP through interconnection policy.¹⁷

Revisiting these issues in order to promote CPP is both inappropriate as a matter of law and unsound policy. As its advocates openly admit, this new model for interconnection would involve either negotiations between carriers or regulation in setting the end-user prices CMRS carriers charge to their customers - either customers placing calls into the CMRS network or out from the network - based on some negotiated

¹³See, e.g., Comments of Sprint PCS at 7-9; Comments of Centennial Cellular at 11-14; Comments of AT&T Wireless at 4 (comparing provision of CPP to access to OSS systems under Section 251(c)(3).

¹⁴See, e.g., Comments of Vanguard Cellular at 4. Vanguard is correct to note that Section 251 requires LECs to offer "information sufficient for billing and collection," i.e., BNA services, as an unbundled element. Accord Comments of SBC at 5.

¹⁵See Comments of Centennial Cellular at 12.

¹⁶Comments of Beples, Inc., at 1.

¹⁷Comments of Sprint PCS at 7.

measure of costs.¹⁸ Sprint PCS, for example, asks the Commission to establish regulatory guidelines for end user rates under a CPP arrangement.¹⁹ But the market for CMRS services is highly competitive and consumers enjoy a wide variety of pricing plans and service options. A system of regulated end-user charges is plainly unworkable in this environment and inconsistent with established policy.²⁰

The competitive environment intended for CMRS services requires that carriers have end-user pricing flexibility to respond to market changes, to offer promotions and discounts, and to provide different price plans to different market segments. CMRS carriers also need the flexibility to adjust prices in order to manage traffic flows and maximize network efficiency. The proposals to eliminate CPP as an end-user option and replace it with a new model for interconnection would stifle this pricing flexibility and reduce the number of promotions, discounts, and other consumer options available in the CMRS market. It would also impinge on carriers's ability to use price to anticipate and control demand for capacity and thereby efficiently engineer their networks. Implementing CPP through revised interconnection policies would unnecessarily constrain carriers and take options away from consumers.

For the same reasons, reciprocal compensation arrangements do not obviate the need for CPP, as some parties allege.²¹ Existing reciprocal compensation arrangements properly deal with interconnection only, they do not address how CMRS carriers offer end

¹⁸See Comments of Sprint PCS at 8; Comments of Centennial Cellular at 14.

¹⁹Comments of Sprint PCS at 10.

²⁰ See 47 U.S.C. § 332(c)(3)(A); H.R. Rept. 103-111 (noting that Congressional policies embodied in Section 332 are intended to yield increased competition and subscriber choice); Second Report and Order, 9 FCC Rcd 1411, para. 250 (Congress intended to eliminate unneeded rate regulation of CMRS).

²¹See Comments of Bay Springs Telephone Co, Crockett Telephone Co., National Tel. of Alabama, Peoples Telephone Co., Roanoke Tel. Co., and West Tenn. Tel. Co. (collectively "Rural Telephone Companies") at 4.

users a wide variety of billing options and pricing plans.²² Carriers still recover some of their costs through end-user charges, the level of which is set in a competitive market. Having gone to great lengths to license new spectrum, issue new competitors, and create a myriad of new wireless service and pricing options for consumers, now is not the time to change the Commission's policy direction for the CMRS market.²³

II. The Commission Should Exercise Its Title I Authority to Require that LECs Offer Billing and Collection Services Necessary for CPP

Each commenting party who addressed the issue agrees that CPP is not a viable business proposition absent an agreement by a ILEC (or other originating carrier) to bill and collect CPP charges from end user customers who purchase CMRS services by making calls to wireless subscribers.²⁴ Since the CMRS operator has no customary direct relationship with the calling party, LECs or other carriers who do have such a relationship should be required to provide the CMRS carrier with billing and collection services to bill customers who are CPP calling parties.²⁵ Absent these billing and collection services, CPP is an unworkable proposition.

Some parties suggest requiring LECs to make billing and collection services available under the Commission's Section 251 or 332 authority, or to determine that billing and collection is a common carrier offering.²⁶ AirTouch believes issuing an NPRM proposing this approach could involve the Commission in complex debates involving much

²²See Comments of Omnipoint at 3; Comments of AT&T Wireless at 5 (noting that LECs must continue to fulfill reciprocal compensation requirements even where CPP has been implemented).

²³The Commission's model for the CMRS industry generally emphasizes that competition is preferable to regulation. See, e.g., Implementation of Sections 3(n) and 332 of the Communications Act, Third Report and Order, 9 FCC Rcd 7988, 8004 (1994).

²⁴See, e.g., Comments of Omnipoint at 8; Comments of Vanguard at 2; see also Comments of Rural Telecommunications Group at 3 (billing issues are biggest obstacle to the implementation of CPP).

²⁵See Comments of Omnipoint at 7.

²⁶See, e.g., Comments of Vanguard at 5 (arguing that LECs are obligated to provide billing and collection services under Section 251(c)); Comments of Centennial Cellular at 11 (FCC has authority to require LECs to offer billing and collection pursuant to Sections 332 and 201 of the Act).

broader issues and thereby delay CMRS carriers' ability to implement CPP. The simpler and more preferable outcome is for the Commission to simply exercise the Title I authority reserved when the Commission detariffed billing and collection services.²⁷

Section 251 or other authority is not necessary because the sole functions required by CMRS carriers to offer CPP are the billing and collection services generally provided to interexchange carriers and the like. AirTouch is simply asking that the Commission require LECs to provide these existing services in order to foster CPP; these services are often already described in an existing tariff. There is no need to build the record necessary to make LEC billing and collection services a common carrier service that LECs must make available to the general public. It is sufficient to find that requiring LECs to provide such services for CPP is necessary for a statutory purpose and therefore authorized by Title I.

Section 251 is also unnecessary because CPP does not require LECs to offer billing and collection services as part of a larger package of services. The record demonstrates that other functions necessary for CPP may be purchased from the LEC or a third party provider, or that a CMRS carrier may elect to provide these functions itself. As Omnipoint explains, "a CMRS operator does depend on the LEC for the CPP billing and collection services within that LEC's service area," but "has no technical reason to employ a LEC to perform the Intelligent Network (IN) component of a CPP service option."²⁸ CMRS providers offering CPP do not necessarily wish nor expect to depend on LECs to provide all the network functions needed to properly route and rate LEC to CMRS traffic.

²⁷See Comments of AirTouch at 18, citing "Detariffing of Billing and Collection Services," Report and Order, 102 F.C.C. 2d 1150, 1168, n. 47 (1986).

²⁸Comments of Omnipoint at 9; see also Comments of Source One at 6 (Source One has developed its own CPP platform); Comments of AirTouch at Appendix A (explaining call processing for CPP).

SBC would leave the availability of billing and collection services up to negotiations between LECs and CMRS carriers.²⁹ AirTouch provided in its initial comments plain evidence why a “negotiations” policy will eliminate CPP as a consumer option in areas where SBC affiliates are the LEC - a letter from SBC management refusing to negotiate with AirTouch. SBC’s refusal to provide these billing and collection services is the sole obstacle to AirTouch’s implementation of a CPP trial in California. SBC’s support of negotiations should be carefully weighed against its bargaining power that renders discussion of negotiations meaningless.

SBC claims that consumers in a competitive market should make the decision whether or not CPP is an attractive option.³⁰ AirTouch agrees, but in order for consumers to even have the opportunity to make such a decision, the Commission must require LECs to offer billing and collection services at just and reasonable rates to CMRS providers seeking to implement a CPP option. The Commission has ample authority to do so under Title I of the Communications Act which authorizes the Commission to take action “necessary for a statutory purpose.”³¹ Such action would further several statutory purposes. First, CPP would promote competition in the market for local telecommunications services and increase communications service options for consumers.³² Additionally, Commission action in this respect would secure a more effective and efficient execution of the policies of the Communications Act.³³

²⁹See Comments of SBC at 16-17.

³⁰Comments of SBC at 1.

³¹47 U.S.C. § 154(i); see Comments of AirTouch at 18-19.

³²The Telecommunications Act of 1996 was passed to “accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans by opening all telecommunications markets to competition.” H.R. Rep. No. 104-458, 104th Cong., 2d Sess. (January 31, 1996)(“Conference Report”). The Notice states that the Commission is committed to taking necessary actions to increase consumer options for local telephone service. Notice, para. 1. Also, it is a purpose of the Communications Act to make communications available “so far as possible, to all the people of the United States.” 47 U.S.C. § 151.

³³It is a purpose of the Communications Act to secure a more effective execution of this policy by vesting certain authority with the Commission. 47 U.S.C. § 151.

III. The Industry Is Best Positioned to Address Technical Issues

Consistent with the perspective that CPP is simply a billing service, not a new interconnection arrangement, no new investments by LECs or other carriers should be necessary to implement CPP. And, as Illuminet notes, CPP can be provided in a manner that uses existing network solutions.³⁴ Of course, carriers should be encouraged to invest in more efficient solutions should business judgment warrant such investment.

The record indicates that certain LECs do not have the SS7 functionalities needed to pass the billing information required to implement CPP service, or to perform other functions such as call branding.³⁵ First, many of the network functions needed, such as call branding, will be performed by the CMRS carrier, not the LEC. In a CPP environment, SS7 is used to identify the calling party; its absence can lead to further "leakage." To the extent that smaller LECs are unable to provide this information, clearinghouse arrangements can minimize the expense of the functionalities needed. And, as AirTouch and others noted, industry efforts are underway to develop clearinghouse and other arrangements, including technical standards and billing formats. In particular, AirTouch supports the technical direction being provided by CTIA. No regulatory intervention is needed at this time.³⁶

IV. CPP Will Produce Economic Benefits for Consumers

AirTouch discussed the economic benefits of CPP at length in its initial comments; we will not repeat that discussion here. The comments do raise three arguments concerning the economic benefits that warrant rebuttal: 1) that CPP will in fact discourage use of wireless services and exacerbate traffic imbalances; 2) that experience in other markets is not comparable because of measured-rate service and inferior wireline service

³⁴Comments of Illuminet at 2.

³⁵Comments of the Rural Telephone Companies at 9; Comments of USTA at 6.

³⁶See, e.g., Comments of AirTouch at 25; Comments of USTA at 6.

quality in those markets; and 3) that CPP will somehow restrain competition between broadband wireless carriers.

For example, SBC argues that while CMRS customers are accustomed to paying a premium for the benefits of mobility, calling parties accustomed to flat-rate free local calling will restrain their calling.³⁷ SBC argues that, because of this fact, international experience with CPP is not indicative of demand for CPP in the U.S.³⁸ Other commenters note similar concerns, but observe that the matter is primarily one of consumer education – not an insurmountable barrier to CPP.³⁹

First, whether CPP will in fact discourage inbound calling is a question that should be left to consumers to answer. The point of this proceeding should not be to make regulatory judgments regarding the likely success of CPP, but simply to identify barriers to this new consumer option and address them.⁴⁰ Moreover, CPP is likely to create some benefits. Certainly some customers will value the ability to reach a called party who is on the move, and will find the service beneficial. Linking price and value in this manner sends better pricing signals and encourages economic efficiency. CPP will require that consumers who are accustomed to making local calls to CMRS subscribers for “free” are educated. But, as AirTouch and other parties explained, CPP embodies a general principle that consumers are already accustomed to: the principle that the party electing to purchase services pays for them.⁴¹ CPP is therefore likely to stimulate fixed to mobile calling, and educating consumers about CPP is not likely to be so difficult as SBC assumes.

³⁷Comments of SBC at 8.

³⁸Id. at 13.

³⁹See, e.g., Comments of PageNet at 8; Comments of Sprint Corp. at 2.

⁴⁰See, e.g., Comments of PageNet at 7 (market should determine whether CPP will have a demonstrative effect on U.S. CMRS subscribers).

⁴¹See Comments of AirTouch at 6; accord Comments of PCIA at 10.

SBC's comparison to international experience is flawed in other respects. SBC maintains that CPP's success overseas is due in part to the inferiority of wireline service or delays in obtaining landline service on a timely basis.⁴² First, SBC's quotes from a Venezuelan operator plainly state that CPP makes cellular attractive. Moreover, SBC's comparisons to Venezuela fail to address the experience in other areas of the world, such as Sweden, where landline service is not notably inferior. Finally, the Commission should recognize that the most important aspect of CPP is not whether CPP makes wireless a competitive substitute for wireline telephone service and thereby brings much desired local competition. Rather, the most important reason to address barriers to CPP is that CPP provides new consumer benefits by encouraging consumers to take fuller advantage of mobile networks.⁴³

Many other factors are involved in bringing about local competition. CPP will not make wireless a competitive alternative to wireline services absent significant pricing reform of local services. Most LEC customers enjoy flat-rated, unlimited local calling, a below-cost arrangement made possible in part by subsidy payments to the LECs from competitors. CPP will not discourage wireless as a substitute for local exchange services, but neither will it, by itself, make wireless a competitive substitute for such services.

CPP will benefit CMRS consumers and enable CMRS carriers to use yet another feature to distinguish themselves in the market. As Omnipoint argues, CPP is critical for new entrants to be able to offer potential customers a differentiated service option.⁴⁴ SBC opposes CPP based on the unbelievable claim that CPP is anti-competitive: incumbent cellular carriers will use CPP to "undercut" competitive offerings of "first-minute free" features by PCS carriers such as Pacific Bell Mobile Services. SBC claims that this would be "harmful to the ability of new entrants such as PBMS to meet the marketplace and

⁴²Comments of SBC at 13.

⁴³See also Comments of GTE at 10 (Commission should focus on benefits to CMRS market of facilitating a CPP option).

⁴⁴Comments of Omnipoint at 19.

benefit consumers.”⁴⁵ In other words, customers might find CPP a more attractive option than “first-minute free” and therefore purchase services from other carriers. How SBC concludes that this is in fact harmful to consumers is unclear.

CONCLUSION

In order to promote the increased availability of consumer choices for CMRS, and preserve CMRS carriers’ flexibility to price in response to competition, the Commission should not treat CPP as a communications service or an interconnection service. It should simply require LECs to offer billing and collection services for CPP, and continue efforts to remove subsidies from local wireline rates in order to promote local competition.

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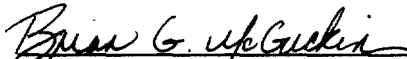
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⁴⁵Comments of SBC at 9.

Certificate of Service

I, Brian G. McGuckin, hereby certify that a copy of the foregoing Reply Comments of AirTouch Communications, Inc. was sent by hand or United States first-class mail, postage prepaid, on this the 16th day of January, 1998 to the parties listed below.


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